

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

VIMALA LLC, dba ALECIA)
and)
ALECIA VENKATARAMAN,)
)
Plaintiffs,) Case No. 3:19-cv-00513
)
v.)
)
WELLS FARGO BANK, N.A. and WELLS)
FARGO MERCHANT SERVICES, LLC,) JURY DEMAND
)
Defendants.)
)
)

**[PROPOSED] ORDER GRANTING DEFENDANTS'
MOTION FOR SANCTIONS**

BEFORE THIS COURT is Defendants Wells Fargo Bank, N.A. and Wells Fargo Merchant Services, LLC's Motion for Sanctions against Plaintiffs Vimala LLC, dba Alecia and Alecia Venkataraman and their counsel Barham & Maucere LLC pursuant to Federal Rules of Civil Procedure 11 and 37 and the Court's inherent powers. Having considered the Motion for Sanctions, Plaintiffs' and their counsel's responses, any timely filed reply, and all relevant papers and pleadings on file, it is hereby **ORDERED** and **DECREED** that said Motion is **GRANTED**.

IT IS FURTHER ORDERED that Plaintiffs' Verified Complaint (ECF #1) is stricken and the above-captioned lawsuit shall be dismissed with prejudice.

IT IS FURTHER ORDERED that Plaintiffs and their counsel Barham & Maucere LLC shall be subject to monetary sanctions in an amount equal to the reasonable attorney's fees Defendants expended in defending against the above-captioned lawsuit and in filing the Motion for Sanctions.

SIGNED this ____ day of _____, 2021.

UNITED STATES DISTRICT JUDGE